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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

15 M 0683

- against -

PETER-GAY SCOTT,

Defendant.
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PRE-ARRAIGNMENT
COMPLAINT
(21 U.S.C. §§ 952(a)
and 960)

EASTERN DISTRICT OF NEW YORK, SS:

EDWARD GONZALEZ, being duly sworn, deposes and states that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about July 17, 2015, within the Eastern District of New York and elsewhere, the defendant PETER-GAY SCOTT did knowingly, intentionally and unlawfully import into the United States from a place outside thereof, cocaine, a Schedule II controlled substance.


(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On July 17, 2015, the defendant PETER-GAY SCOTT, a citizen of Jamaica, arrived at John F. Kennedy International Airport ("JFK") in Queens, New York aboard Jet Blue Flight Number 480 from Montego Bay, Jamaica.
2. A Customs and Border Protection ("CBP") officer stopped the defendant for a border enforcement examination. A pat-down was conducted. The pat-down revealed a foreign object in the defendant's groin. The defendant then stated that she had inserted an object into her vagina. The defendant then voluntarily removed the object from her vagina. The object was probed and revealed the presence of a white powdery substance, which field-tested positive for cocaine. The defendant then admitted to having swallowed pellets. The defendant then read a standard x-ray consent form, which she signed. The defendant was then transported to the medical facility at JFK, where the x-ray showed the presence of foreign bodies inside the defendant's intestinal tract.
3. The defendant will be detained at the JFK medical facility until such time as she has passed all the pellets contained within her intestinal tract.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully request that the defendant be dealt with according to law.



EDWARD GONZALEZ
Special Agent
Homeland Security Investigations

Sworn to me before this
18th day of July, 2015

S/ Vera Scanlon



THE HONORABLE VERA SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK